

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

**LEAR CORPORATION,**

**Plaintiff,**

**v.**

**NHK SEATING OF AMERICA,  
INC.**

**Defendants.**

Case No. 2:13-cv-12937-LJM-RSW

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR LEAVE TO  
FILE UNDER SEAL**

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Plaintiff Lear Corporation (“Lear”) respectfully submits this Unopposed Motion for Leave to File Under Seal certain contents of Lear Corporation’s Response In Opposition to Motion for Summary Judgement, along with the Exhibits summarized in the table below.

The authority for sealing such documents is pursuant to Local Rule 5.3, as well as the Stipulated Protective Order (Dkt. #27) entered in the present case.

Lear references information from documents produced by NHK Seating of America, Inc. (“NHK”) during discovery, which pursuant to the Protective Order, have been designated as “Highly Confidential – Attorney’s Eyes Only.” Lear believes this information designated as confidential is necessary to support Lear’s Reply in Support of Consolidation. Therefore, Lear requests the following documents to be filed under seal:

<b>Document</b>	<b>Contents</b>
<b>Plaintiff’s Response In Opposition To Motion For Summary Judgment</b>	
Exhibit 1	Declaration of Dr. David Viano
Exhibit 13	Engineering Drawing - Upper Unit NSA_00002123
Exhibit 14	Engineering Drawing - Lower Unit NSA_00002102
Exhibit 15	Engineering Drawing - Lower Unit NSA_00002101
Exhibit 16	Engineering Drawing - Link B NSA_00002106
Exhibit 18	Kevin Hughes Deposition Transcript
Exhibit 21	Engineering Drawing - Upper Stroke Tester NSA_00017223
Exhibit 22	Engineering Drawing - Cable Drawing NSA_00002122

Lear is requesting the Court to seal portions of the above-identified response brief and exhibits because NHK has designated the documents and information referenced therein as containing or referring to “trade secrets or other confidential research, development, business or financial information, or other confidential

commercial information, and that, if disclosed to a business competitor, would tend to damage the party's competitive position." (Protective Order, Dkt. #27 at 1.)

Pursuant to Local Rule 7.1(a), Lear has conferred with counsel for NHK, and NHK does not oppose the present motion. A proposed stipulated order consistent with the relief requested in this motion is also being submitted for approval.

Respectfully submitted,

**BROOKS KUSHMAN P.C.**

Dated: November 9, 2018

/s/ John M. Halan  
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*Attorneys for Plaintiff Lear Corporation*

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that on November 9, 2018, I electronically filed the foregoing **UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL** with the Clerk of the Court for the Eastern District of Michigan using the ECF System. I submitted copies of all sealed documents via electronic means to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing:

I further certify that I have mailed by United States Postal Service the paper to the following non-participants in the ECF System: None.

Respectfully submitted,

**BROOKS KUSHMAN P.C.**

/s/ John M. Halan  
\_\_\_\_\_  
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